DEPARTMENT OF THE NAVY

PUGET SOUND NAVAL SHIPYARD
AND INTERMEDIATE MAINTENANCE FACILITY
1400 FARRAGUT AVENUE STOP 2090
BREMERTON WASHINGTON 98314-2090

IN REPLY REFER TO:
5090
Ser 106.32/126
JUL 0 2 2019

U.S. Environmental Protection Agency
Water and Wetlands Enforcement Unit
Attention: Chae Park
1200 6th Avenue, Suite 155
M/S: 20-CO4
Seattle, WA 98101-3123

Dear Mr. Park,

This letter is in response to the U.S. Environmental Protection Agency (EPA) Notice of Violation (NOV) for Total Recoverable Copper (TRC) limits set by the Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) National Pollutant Discharge Elimination System (NPDES) permit issued on April 1; 1994. The NOV was received on June 04, 2019.

Enclosure (1) contains PSNS & IMF's response to each of the exceedances identified in the NOV. Of note, all of the Outfall 18 exceedances occurred prior to the completion of the Process Water Collection System upgrades required by the 2013 Federal Facilities Compliance Agreement (FFCA). PSNS & IMF has been in continuous compliance at Outfall 18, the primary outfall for five of the six dry docks at the facility, since four out of the five PWCS upgrades were completed in October 2017.

The instances of non-compliance at Outfall 19 require further discussion. Dry Dock 6 is the sole source of the discharge at Outfall 19. The PWCS upgrades for Dry Dock 6 were completed in June 2014. Prior to June 2018, the last exceedance at Outfall 19 occurred in April 2013. During the months of June and August 2018, high flows from a vessel in Dry Dock 6 caused daily maximum loading exceedances without TRC concentrations exceeding the monthly average concentration limit. The permit loading limits for Outfall 19 were originally calculated using an outfall flow rate of 5.24 million gallons per day (MGD), but the average daily flow rate in June and August 2018 was approximately 12.6 MGD. There is no single identifiable cause for the loading and concentration exceedances from July 2018. At this time, PSNS & IMF has completed the specific actions in the 2013 FFCA and is emphasizing Best Management Practices to control TRC.

PSNS & IMF remains committed to working with EPA Region 10 in a collaborative effort to resolve this NOV and the continuing utility of the existing FFCA.

We look forward to meeting on this topic soon. In the meantime, questions or comments regarding the contents of this letter may be addressed to Trevor Richardson at (360) 476-0118.

Sincerely,

M.S. JOHNSON
Head, Environment, Safety, and Health Office

Enclosure: 1. PSNS & IMF Notice of Violation Findings-Causes and Corrective Measures

PSNS & IMF Notice of Violation Findings - Causes and Corrective Measures

Date	Outfall	Exceedance(s)	Cause	Corrective Measures
Oct-2013	18	Daily Maximum Loading Monthly Average Loading	Excess flow from Outfall 18 caused loading exceedances without monthly Total Recoverable Copper (TRC) concentrations exceeding the monthly average limit.	Continued to enforce dry dock Best Management Practices (BMPs) in an effort to reduce TRC concentrations in outfall discharge.
Nov-2013	18	Daily Maximum Concentration Monthly Average Concentration Daily Maximum Loading Monthly Average Loading	After investigation, a definitive cause was not able to be identified.	Implemented actions required by 2013 Federal Facilities Compliance Agreement (FFCA) and continued enforcement of dry dock BMPs.
Dec-2013	18	Daily Maximum Concentration Monthly Average Concentration Daily Maximum Loading Monthly Average Loading	Issues with PWCS flow data at Dry Dock 2 could have caused process water to be discharged to the dry dock drainage system.	Implemented actions required by 2013 FFCA.
Jan-2014	18	Daily Maximum Loading	Excess flow from Outfall 18 caused a daily maximum loading exceedance without TRC concentrations exceeding the daily maximum concentration limit.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
Feb-2014	18	Monthly Average Loading	Excess flow from Outfall 18 caused a monthly average loading exceedance without TRC concentrations exceeding the monthly average limit.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
Mar-2014	18	Daily Maximum Concentration Daily Maximum Loading	Inadequate flushing of the Outfall 18 sample line caused debris from the sample line to be included in the sample.	Employees conducting sampling were briefed on the importance of flushing the outfall sampling line. This sampling line was later removed in June of 2017.
May-2015	18	Daily Maximum Concentration	Likely caused by buildup in the Outfall 18 sampling line. No dry dock Process Water Collection Systems (PWCS) discharged to the dry dock drainage system during the reporting period.	Outfall 18 sample line was relocated to shorten the distance from the discharge to the sample point. This sample line was later removed in June of 2017.
Oct-2015	18	Daily Maximum Loading Monthly Average Loading	Excess flow from Outfall 18 caused a monthly average loading exceedance without monthly TRC concentrations exceeding the monthly average limit.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
Nov-2015	18	Daily Maximum Concentration Daily Maximum Loading	Work associated with PWCS upgrades required diversion of process water to the dry dock drainage system.	Implemented actions required by 2013 FFCA.
Aug-2016	18	Daily Maximum Loading	High flow through Outfall 18 caused a daily maximum loading exceedance when TRC concentrations did not exceed daily maximum concentration.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
May-2017	18	Daily Maximum Concentration Daily Maximum Loading Monthly Average Loading	PWCS systems were down for upgrades in 3 of 5 dry docks discharging to Outfall 18. Temporary pumping systems installed to prevent discharge of process water to the dry dock drainage system were likely overwhelmed during heavy rain events.	Implemented actions required by 2013 FFCA.

PSNS & IMF Notice of Violation Findings - Causes and Corrective Measures

Date	Outfall	Exceedance(s)	Reason	Corrective Measures
Sep-2017	18	Daily Maximum Concentration Monthly Average Concentration Daily Maximum Loading Monthly Average Loading	PWCS systems were down for upgrades in 2 of 5 dry docks discharging to Outfall 18. Temporary pumping systems installed to prevent discharge of process water to the dry dock drainage system were likely overwhelmed during heavy rain events.	Implemented actions required by 2013 FFCA.
Jun-2018	19	Daily Maximum Loading	Excess flow from Outfall 19 caused a daily maximum loading exceedance without TRC concentrations exceeding the monthly average limit.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
Jul-2018	19	Daily Maximum Concentration Daily Maximum Loading Monthly Average Loading	No cause was identified after investigations on work both inside and outside the vessel in dry dock. The Dry Dock 6 PWCS was fully functional during the month of July, and no alarms indicating an overflow to the dry dock drainage system were received.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.
Aug-2018	19	Daily Maximum Loading	Excess flow from Outfall 19 caused a daily maximum loading exceedance without TRC concentrations exceeding the monthly average limit.	Continued to enforce dry dock BMPs in an effort to reduce TRC concentrations in outfall discharge.